S 353.5331 L72FPP 2004 1

### **Legislative Audit Division**



State of Montana

Report to the Legislature

December 2004

**Performance Audit** 

### **Foster Parent Program**

**Department of Public Health and Human Services** 

**Child and Family Services Division** 

The Child and Family Services Division within the Department of Public Health and Human Services relies upon foster parents to provide care for children removed from their homes because of abuse or neglect. This performance audit examined how the department recruits, trains, and retains foster parents. Recommendations in this report address:

- Making program information more available to persons interested in becoming foster parents.
- ▶ Implementing a coordinated statewide recruitment effort.
- Increasing availability of training for prospective foster parents.
- Improving the foster parent training evaluation process.
- Developing a structured process for modifying the foster parent training curriculum.
- Implementing a comprehensive plan for improving foster parent retention.

Direct comments/inquiries to: Legislative Audit Division Room 160, State Capitol PO Box 201705 Helena MT 59620-1705 STATE DOCUMENTS COLLECTION

JAN 20 2005

MONIANA STATE LIBRARY 1515 E. 6th AVE. HELENA MINITING 5960

04P-03

Help eliminate fraud, waste, and abuse in state government. Call the Fraud Hotline at 1-800-222-4446 statewide or 444-4446 in Helena.



#### PERFORMANCE AUDITS

Performance audits conducted by the Legislative Audit Division are designed to assess state government operations. From the audit work, a determination is made as to whether agencies and programs are accomplishing their purposes, and whether they can do so with greater efficiency and economy. The audit work is conducted in accordance with audit standards set forth by the United States Government Accountability Office.

Members of the performance audit staff hold degrees in disciplines appropriate to the audit process. Areas of expertise include business and public administration, mathematics, statistics, economics, political science, criminal justice, computer science, education, and biology.

Performance audits are performed at the request of the Legislative Audit Committee which is a bicameral and bipartisan standing committee of the Montana Legislature. The committee consists of six members of the Senate and six members of the House of Representatives.

#### MEMBERS OF THE LEGISLATIVE AUDIT COMMITTEE

Senator John Cobb Senator Mike Cooney Senator Jim Elliott, Vice Chair Senator John Esp Senator Dan Harrington Senator Corey Stapleton Representative Dee Brown
Representative Tim Callahan
Representative Hal Jacobson
Representative John Musgrove
Representative Jeff Pattison, Chair
Representative Rick Ripley

## **Legislative Audit Division**

Performance Audit

## **Foster Parent Program**

Department of Public Health and Human Services
Child and Family Services Division

Members of the audit staff involved in this audit were Jim Pellegrini and Kent Wilcox.



#### LEGISLATIVE AUDIT DIVISION

Scott A. Seacat, Legislative Auditor John W. Northey, Legal Counsel



Deputy Legislative Auditors: Jim Pellegrini, Performance Audit Tori Hunthausen, IS Audit & Operations James Gillett, Financial-Compliance Audit

December 2004

The Legislative Audit Committee of the Montana State Legislature:

This is our performance audit of the Foster Parent Program managed by the Child and Family Services Division within the Department of Public Health and Human Safety.

This report provides the legislature information about recruitment, training, and retention of foster parents. Foster parents provide essential care and services for children who have been removed from their home because of abuse or neglect. This report includes recommendations for improving Child and Family Services Division efforts to recruit, train, and retain foster parents.

We wish to express our appreciation to Child and Family Services Division personnel for their cooperation and assistance during the audit.

Respectfully submitted,

Scott A. Seacat Legislative Auditor Digitized by the Internet Archive in 2010 with funding from Montana State Library

### **Table of Contents**

	List of Figures and Tables	iii
	Appointed and Administrative Officials	
	Report Summary	
Chapter I - Introduction an	d Background	1
	Introduction	
	The Foster Parent Program is Part of the Child Protection System	1
	The Division's Child Protection Mission	1
	Audit Scope and Objectives	2
	The Division is Responsible for Licensing	
	Minimum Requirements for Foster Care Licensure	
	Types of Foster Care	
	Types of Foster Care Licenses	
	Family Resource Specialists Responsible for Most Program	
	Activities	5
	The Licensing Process	
	License Limitations	
	Foster Parents May Limit Licensure	
	Foster Parents Are Reimbursed for Child Care Expenses	
	The Division Also Offers Supplemental Support Services	
	Montana Foster Parent Characteristics	
	Demographic Information	
	Reasons for Becoming Foster Parents	
	Foster Parents Are An Adoption Resource	
	Report Organization	
	Report Organization	1 1
Chapter II - Foster Parent 1	Recruitment, Licensing, and Activities	13
	Introduction	
	The Division Has Worked to Enhance the Foster Parent Program	
	Background Checks	
	Foster Parents Generally View Division Personnel Positively	
	Foster Parents Generally Stop Providing Foster Care for	
	Personal Reasons	15
	Division Not Meeting its Recruitment Objectives	
	Significant Regional Variations	
	Recruitment, Training, and Retention are Essential	
	Comprehensive Plans for the Foster Parent Program	
	The Division Needs a Comprehensive Recruitment Plan	
	Recruitment Requires a Comprehensive Plan	
	Improve Access to Program Information	
	Expand and Improve Coordination of Recruitment Efforts	
	A Comprehensive Statewide Effort Would Help	
	•	
	Summary  Management Memorandums	
	FRS Participation in Family Group Conferences	
	Revising Language in Recruiting Contracts	
	Improving Orientation and Preservice Training	
	Increasing Availability of Training for New Foster Parents	
	microasing Availability of Training for them Poster Parells	24

### **Table of Contents**

	Limited KCS Training Opportunities Can Reduce Access to	
	Federal Funds	
	The Division Should Set Standards for Training Availability	25
	Improving Processes for Evaluating and Modifying the KCS  Curriculum	27
	The Division Can Improve the KCS Evaluation Form	
	Modifying the KCS Evaluation Form	
	Summary	
	The Division Can Improve Tracking and Monitoring of KCS	2
	Evaluations	29
	Summary	
	A Structured Approach to KCS Curriculum Development	
	The Division Should Establish a Structured Curriculum	
	Development Process	31
	Foster Family Retention	
	The Division Can Improve Communication with Foster Parents.	
	The Division Can Improve Evaluation of Retention Efforts	
	Improving the Division's Retention Efforts	
	Summary	
	Management Memorandum	
		25
Appendix A- Methodology	Audit Cooms and Evolutions	
	Audit Scope and Exclusions	
	Scope Exclusions	
	Audit Planning	
	Determination of Audit Activities	
	Foster Parent Survey	
	Foster Parent Recruitment	
	Training for New Foster Parents	
	Foster Parent Retention	
	Review of Other States Foster Parent Program Activities	
A L' D C D		41
Appendix B - Survey Resp	onse Data	41
Agency Response		A-1
	Department of Public Health and Human Services	Δ_3

### **List of Figures and Tables**

FIGURES .		
Figure 1	Chapter II Organization Overview	12
Tables		
Table 1	Foster Care Daily Reimbursement Rates FY 2003	8
Table 2	Would You Be Willing to Adopt a Foster Child	
	Placed in Your Home?	10
Table 3	Number of Foster Homes and Children in Care	
Table 4	How Foster Parents Learned About Foster Care	

#### Appointed and Administrative Officials

Department of Public Health and Human Services

Gail Gray, Ed. D., Director

Shirley K. Brown, J.D., Administrator Child and Family Services Division

Kathy Ostrander, Chief Program Services Bureau

**Regional Administrators** 

Eric Barnosky, Region I, Miles City

Cory Costello, Region II, Great Falls

Kevin Frank, Region III, Billings

Fred Fisher, Region IV, Helena

Art Dreiling, Region V, Missoula

#### Introduction

The Child and Family Services Division (division) within the Department of Public Health and Human Services (DPHHS) is the agency responsible for protecting Montana children who are abandoned, neglected, or abused. To meet this mandate, the division must place these children in out-of-home placements until children can be reunited with their family or placed in an adoptive home or other permanent placement. Youth foster homes are an essential component of the child protection system. This performance audit examined division activities for recruiting, training, and retaining foster families.

# Foster Care Licensing Requirements

To be a licensed foster parent, a person must be at least 18 years old, be of good moral character, be physically, mentally, and emotionally competent to care for children in care, have no substantiated allegations of abuse or neglect, and not be convicted of certain violent or drug offenses. Prospective foster parents must also complete the division's foster parent training program called Keeping Children Safe and Families Strong (KCS).

#### **Types of Foster Care**

The division issues four primary types of foster care licenses:

- Regular Foster Care License.
- Specialized Foster Care License for licensees who have received additional training to care for children with higher care needs.
- Licensed Kinship Providers, who meet the same standards for a regular license, but are limited to caring for specific children. Kinship homes include family members, other adults with close ties to the child needing a foster home, or members of the family's or child's tribe.
- Provisional Foster Care License, which is commonly issued to persons who completed some, but not all, licensure requirements.

The Division Has Worked to Enhance the Foster Parent Program

The division has worked to improve the effectiveness of program activities, including:

#### Report Summary

- Implementing a compliance unit that has improved the consistency of the foster care licensing process.
- Developing a foster parent training program specific to Montana needs.
- ▶ Coordinating with the Montana State Foster/Adoptive Parents Association to implement a formal dispute resolution process for foster parents and the division.
- Contracting with a private organization to develop a statewide campaign to promote and increase awareness of the need for foster and adoptive parents.

Background Checks for Foster Parents are Completed

Statute and administrative rules require the division conduct a child protective services and criminal history checks of persons providing out-of-home care to children. Our review indicated the division has controls in place to assure compliance with these requirements. Additionally, our review found licensee files contained documentation of background checks.

Foster Parents Generally View Division Personnel Positively We surveyed current and former foster parents about division program activities. Overall, foster parents indicated division personnel are professional, place children that meet age and gender preferences, and help them through the licensing process. Former foster parents most frequently cited personal or family reasons for leaving the program.

The Division Is Not Meeting its Objectives for the Number of Licensed Foster Families The division has experienced an overall decline in the number of foster parents between fiscal years 2001 and 2004. This affects the division's ability to meet its objectives for placing children in the most appropriate placement and increasing the stability of child placements. Additionally, limited availability of foster care placements can increase demands on existing foster parents and potentially impact retention.

The Division Needs a Comprehensive Recruitment Plan

Historically, the division has delegated foster parent recruitment, training, and retention to family resource specialist (FRS) located in regional or local offices, but has not had comprehensive statewide plans for monitoring and evaluating these activities.

The division has not established an effective statewide plan for recruiting foster parents. While recruiting activities among offices are similar, the timing and extent of recruiting efforts varies. Audit work indicated access to and availability of program and contact information in some areas is limited. Some division offices have limited their recruitment efforts primarily to larger communities, with little effort made in rural areas or smaller communities.

We recommend the division improve public access to foster parent program information and develop and implement a comprehensive statewide recruitment plan.

# **Increasing Availability of KCS Training**

Some regions or offices have established practices that limit the availability KCS training for prospective foster parents. For example, some offices offered training only two or three times a year, offered training only in larger communities, or required minimum class sizes before offering training. Ensuring training is available is essential to maximizing recruiting efforts. We identified some options used in one or more regions to increase training accessibility.

We recommend the division establish minimum standards for offering KCS training and develop strategies and practices to increase training accessibility in rural areas.

# Improving KCS Evaluation Forms

When foster parents complete KCS training, the division requests they evaluate the training. The evaluation form is designed to obtain general information about overall course content and presentation, but is not designed to obtain more specific participant feedback about individual training modules, individual trainers, or other critical training components. An improved evaluation form would increase the division's ability to monitor and evaluate KCS training activities.

We recommend the division modify its training evaluation form to obtain information necessary to comprehensively evaluate training

#### **Report Summary**

operations and the effectiveness of the program relative to training goals and objectives.

# Improving Tracking of Evaluation Forms

The division does not have an effective or efficient system for tracking and monitoring KCS evaluation forms. While FRS supervisors and program officers review evaluations, the division does not enter the information into a system that allows regular and timely access to the information. Consequently, the division has not compiled statewide evaluation data since 2002. The division could also increase efficiency by implementing a "desk-top" management information system.

#### The Division Should Establish a Structured Curriculum Development Process

Some FRS have modified the KCS training curriculum without approval from the central office, resulting in variations around the state. This increases risks that foster parents may not receive training the division determines essential for licensure and can adversely impact the effectiveness of the program.

We recommend the division establish a structured process for reviewing and modifying the approved training curriculum.

# Improving Foster Family Retention

While FRS have primary responsibility for recruitment and training activities, retaining foster parents requires division-wide efforts to support foster parents, including social workers, supervisors, and managers. While the majority of foster parents responded positively about division communication and coordination efforts, responses also indicated areas for improvement. Areas for improvement included keeping foster parents informed about a child's case status and more timely responses to requests for assistance from social workers.

The division has relied primarily on field and supervisory personnel to evaluate retention efforts, but does not have an effective system for regular monitoring and evaluation of retention efforts. The report provides a list of options for improving communication and coordination. We recommend the division establish develop and implement a comprehensive plan with specific strategies for improving foster family retention activities.

### Chapter I - Introduction and Background

#### Introduction

The Legislative Audit Committee requested a performance audit of the Department of Public Health and Human Services' (DPHHS) foster parent recruitment and retention activities. The Child and Family Services Division (division) within DPHHS is responsible for all foster parent program activities. This chapter describes our audit objectives and provides general background information about the foster parent program.

#### The Foster Parent Program is Part of the Child Protection System

The DPHHS is statutorily designated as the agency responsible for protecting children who are abandoned, neglected or abused. The department must respond to report s of child abuse or neglect, and provide protective services when necessary. This includes authority to take temporary or permanent custody of a child when ordered by the court.

### The Division's Child Protection Mission

Foster care is an essential component of the division's child protection mission. When the division removes a child from a home because of abuse or neglect, it must find a suitable and appropriate placement until the child may be returned home, placed in an adoptive home, or another suitable option is identified. Most commonly, the division places children with a foster family or other members of a child's family. When placing a child in a foster home, the division attempts to find the most suitable foster home to minimize the trauma of removal and maintain stability for the child. Factors the division considers include:

- A child's care needs and interests.
- Location of a child's family.
- Locations of schools.
- Foster parent abilities, skills, and lifestyle.

Consequently, the division must maintain a sufficient number of foster homes to accommodate the needs of children in foster care. Previous Legislative Audit Division performance audits identified limited availability of placement options as an area for improvement. Also, the 2002 federal review of the division's foster care activities

#### Chapter I - Introduction and Background

identified stability of foster care placements as an area for improvement, and persons involved in foster care activities commented that limited availability of foster care placements affects stability of foster care placements.

# Audit Scope and Objectives

This performance audit examined division activities related to recruiting, training, and retaining foster parents who provide direct foster care services for the division. Audit objectives included:

- ▶ Determining who provides foster care.
- Examining the division's recruiting strategies to determine if they meet foster care needs.
- Determining if the division completes background checks on all foster parents prior to licensure.
- Determining if foster parent training for prospective foster parents is available within a reasonable time frame and within their geographic area.
- ▶ Determining whether foster care training and continuing education requirements are similar/comparable in all areas of the state.
- Determining whether the division ensures foster parents meet requirements for maintaining licensure.
- Examining whether division strategies for retaining foster families meet its needs.

To meet these objectives, audit work included:

- ▶ Interviewing division personnel, foster parents, and other persons involved with foster care activities.
- Observing recruiting, retention, and training activities.
- ▶ Reviewing program information from other states.
- ▶ Reviewing a statistical sample of foster parent files.
- Conducting a foster parent survey.

More specific information about audit scope and methodologies is presented in Appendix A.

# The Division is Responsible for Licensing

The division is responsible for licensing or approving family foster homes under direct division control. The division licenses child placing agencies, which are contract providers, and must agree to accept division placements. These agencies are responsible for recruiting and training their providers and submitting licensing information to the division for review.

The division also recruits and trains adoptive parents for children in DPHHS custody. When a court terminates parental rights and determines a child is available for adoption, the division is responsible for finding an appropriate adoptive home for the child.

# Minimum Requirements for Foster Care Licensure

Title 37.97.132, Administrative Rules of Montana, identifies general requirements for licensure as foster parents. Licensees:

- ▶ Must be at least 18 years old.
- ▶ Must be of good moral character.
- Must be mentally, physically, and emotionally competent to care for children.
- ▶ Must not have substantiated allegations of child abuse or neglect, or have received services from the department for the abuse or neglect of children.
- Must not have been convicted of certain violent offenses or drug offenses.

The division has also adopted rules to help promote the stability of children placed in foster homes, such as requiring couples to be together for 24 months and not granting licenses to persons who have experienced significant life changes within the last 12 months, such as the death of an immediate family member or a divorce.

#### **Types of Foster Care**

The division uses two basic types of foster care for placing children removed from their homes under direct division supervision:

- <u>Kinship Placements</u>. For placement purposes, the term "kinship" includes immediate or extended family members, other adults who have close ties with the child, or members of a child's or family's tribe.
- <u>"Regular" Foster Care Placements.</u> The division may place, and the foster parents accept, any child for which the home is appropriate.

#### Types of Foster Care Licenses

The division issues four primary types of foster care licenses:

- Regular Foster Care License. A regular foster care license allows the division to place, and foster parents to accept, any child subject to licensure conditions.
- Specialized Foster Care License. The division licenses foster families to provide care for children with greater care needs. Foster families with specialized foster care licenses receive additional training.
- Licensed Kinship Providers. Kinship foster families complete the same licensing requirements as "regular" foster families, and receive the same reimbursements and services as regular foster families. Kinship licenses are restricted to specific children, and social workers may not place other children in these homes.
- Provisional Foster Care License. The division typically issues provisional licenses to meet the immediate placement needs for children. Before issuing provisional licenses, the division conducts background and criminal checks, and the family must complete most parts of the licensing process. Provisional licenses are limited to six months, but may be extended up to an additional six months. The division also uses provisional licenses as a sanction for licensed foster families who fail to comply with division foster care policies.

The division also places children with unlicensed kinship foster parents. The division conducts background and criminal checks of adults living in the home, but does not require these kinship foster parents to complete the regular licensing process. The division does not reimburse unlicensed persons for foster care services, although caregivers or children may be eligible for other limited benefits.

#### Family Resource Specialists Responsible for Most Program Activities

Division family resource specialists (FRS) are assigned primary responsibility for finding and training "resource families," which includes both foster and adoptive families. FRS activities and responsibilities typically include:

- Developing and implementing recruitment efforts within one of the division's five administrative regions or an area within a region.
- Scheduling and conducting training for prospective foster and adoptive parents.
- Licensing and re-licensing foster parents and approving persons for adoption.
- ▶ Scheduling, or assisting foster parents in finding, appropriate ongoing training to meet foster parent licensure requirements.
- Supporting and assisting foster and adoptive parents.
- Assisting social workers in identifying the most appropriate foster or adoptive placements for children.

The division has 24.75 FTE for FRS personnel and five FTE for FRS supervisors for fiscal year 2005. Division management said the number FRS FTE has remained constant since fiscal year 1998.

#### **The Licensing Process**

Persons interested in becoming foster parents must submit an application and complete the training and review process before the division issues a license. The process is designed to ensure persons granted licenses have been trained to care for children in foster care and can provide a safe home for children. The division's licensing process has six primary steps.

- Initial Interview and Preliminary Application. FRS discuss foster care opportunities with persons inquiring about the program. Prospective foster parents must also complete an initial application form that provides basic personal information. FRS uses the information to make a preliminary determination of whether applicants meet minimum licensing requirements.
- Comprehensive Application. Persons interested in pursuing a foster care license complete a comprehensive application that

#### Chapter I - Introduction and Background

requires applicants to submit extensive personal information including:

- ✓ Individual family histories.
- ✓ Current family structure.
- ✓ Parenting styles and experiences.
- ✓ Financial information.
- ✓ Personal references.
- ✓ Personal information and fingerprints necessary to complete a background check.

Applicants may complete the comprehensive application before, after, or in conjunction with the orientation and pre-service training.

- Orientation and Pre-service Training. Applicants must successfully complete an 18-hour orientation and pre-service training program called Keeping Children Safe and Families Strong (KCS) presented by an FRS or approved trainer. KCS provides prospective foster parents with an overview of the foster care system, and information about the foster parent program and foster parenting children in their care.
- ▶ Home Study. FRS complete a home study of applicants, which includes:
  - ✓ Interviewing the prospective foster parents about their lifestyle and interests for foster parenting.
  - ✓ Discussing foster care rules and child care expectations and standards.
  - ✓ Inspecting the home for compliance with environmental and safety regulations.
- Written Assessment. After foster parent applicants complete the application process, FRS assess the applicants and the living situation and submit a written assessment and recommendation to an FRS supervisor for review. The assessment includes determining the suitability of a home for children, such as:
  - ✓ The number of children appropriate for the foster home.
  - ✓ Child ages.

- ✓ Child gender.
- ✓ Children with special needs.
- Review and Licensure. FRS supervisors review license application documentation and are responsible for licensure approval or denial.

#### **License Limitations**

Division policy allows foster parents to care for up to six foster children. Persons with a specialized foster care license may not provide care to more than one child without prior approval of the regional administrator. Commonly, the division places other "limitations" on foster care licenses. For example, a family's lifestyle or structure may be appropriate and beneficial to older children or teenagers, but not appropriate for infants and toddlers.

### Foster Parents May Limit Licensure

Foster parents may also request FRS place limitations on their foster care license based on their preferences, interests, and lifestyle as discussed during the licensing process. For example, foster parents interested in adopting a young child may request FRS limit the license to a specific age group or gender. Foster parents may also set limitations prohibiting the division from placing children with alleged or known behaviors that may pose a risk to family members.

#### Foster Parents Are Reimbursed for Child Care Expenses

Foster parents are not paid for providing care, but are reimbursed for costs of caring for children. The division provides foster parents providing services a "foster care maintenance payment," or daily rate for normal and routine care expenses, such as food, replacing worn or outgrown clothing, and routine transportation. Reimbursement rates are based on a child's age and needs. Table 1 provides rate information for foster homes with regular and specialized care licenses.

#### Table 1

#### Foster Care Daily Reimbursement Rates FY 2003

Regular and Kinship Foster Homes	Per Day
Ages 0-12	\$15.03
Ages 13-21	\$18.09

#### **Specialized Foster Care Homes**

Ages 0-2 (includes diaper allowance)	\$26.91
Ages 3-12	\$25.54
Ages 13-25	\$28.56

Source: Child and Family Services Division

The division does not reimburse kinship foster homes that are approved but not licensed. However, these foster parents may apply for Temporary Assistance for Needy Families grants through the Office of Public Assistance within DPHHS.

The Division Also Offers Supplemental Support Services

The division offers supplemental support services allowances for foster parents based on the needs of children. Generally, support service allowances are intended to reimburse foster parents for non-routine or extraordinary costs. Examples of support service allowances include:

- Diaper allowance.
- Clothing allowance.
- Respite care.
- Transportation for special circumstances.
- ▶ Day care allowance.

The division may reduce, deny, or discontinue support services reimbursements regardless of a child's eligibility if there are

insufficient funds for reimbursements, or the division determines there is not a sufficient need to provide the reimbursements.

#### Montana Foster Parent Characteristics

We reviewed a statistical sample of foster parent licensing files and surveyed foster parents to obtain demographic information.

#### **Demographic Information**

Foster parents come from many sectors of Montana society. The following indicates basic demographical information from division licensing files.

- Approximately 70 percent of licensees are regular or specialized foster homes, and 30 percent are kinship foster homes.
- ▶ 78 percent of foster homes are two-parent households and twenty-two percent are single parent households.
- ▶ A female heads 93 percent of single parent foster homes.
- Approximately 25 percent of kinship homes are single parent homes, and approximately 21 percent of regular/specialized foster homes are single parent homes.
- ► Foster family income levels can vary significantly.

  Approximately 96 percent of the applicants reported incomes of \$40,000 a year or less.
- ▶ The average age of foster parents when they apply is approximately 42. Kinship foster parents, on average, are about 40 years old. The oldest applicant was age 72 and the youngest was age 20.
- Foster parents represented a wide range of professions and occupations, with no specific trends. Professions and occupations included tradespersons, mechanics, educators, medical professionals, retirees, and business professionals.

# Reasons for Becoming Foster Parents

Persons become foster parents for a myriad of reasons, ranging from providing temporary assistance to children needing care to adoption. About 60 percent of foster parents with regular/specialized licenses responding to our survey indicated they became licensed only to provide foster care. About 36 percent responded they became foster parents intending to adopt a child. About 4 percent cited other reasons.

# Foster Parents Are An Adoption Resource

While the division's goal is to reunite children in foster care with their parents whenever possible, in some instances the division must find an adoptive placement. Foster parents are often an adoption resource, regardless of reasons for becoming foster parents. About 49 percent of respondents who said they became licensed only to provide foster care indicated they were willing to or did adopt a foster child. Table 2 presents information about foster parent willingness to adopt a child placed in their home.

Table 2

<u>Would You Be Willing to Adopt</u>

A Foster Child Placed in Your Home?

Would or Have	Kinship Foster Parents 54%	Regular/Specialized Foster Parents 64%
No	26%	15%
Maybe	20%	21%
Total	100%	100%

Source: Legislative Audit Division Foster Parent Survey.

Willingness to adopt a child can vary between the two types of providers. Kinship foster parents can face unique challenges when considering adoption. Grandparents frequently provide foster care, but may be unwilling or unable to adopt grandchildren because of age, health, or finances. Family dynamics and social customs may also impact a kinship foster family's adoption decision.

When a kinship placement is not available, finding children adoptive homes can also be difficult. Factors affecting ability to find adoptive placements include:

▶ The age of children needing care. Division data indicates an inverse relationship between the ages of children entering foster

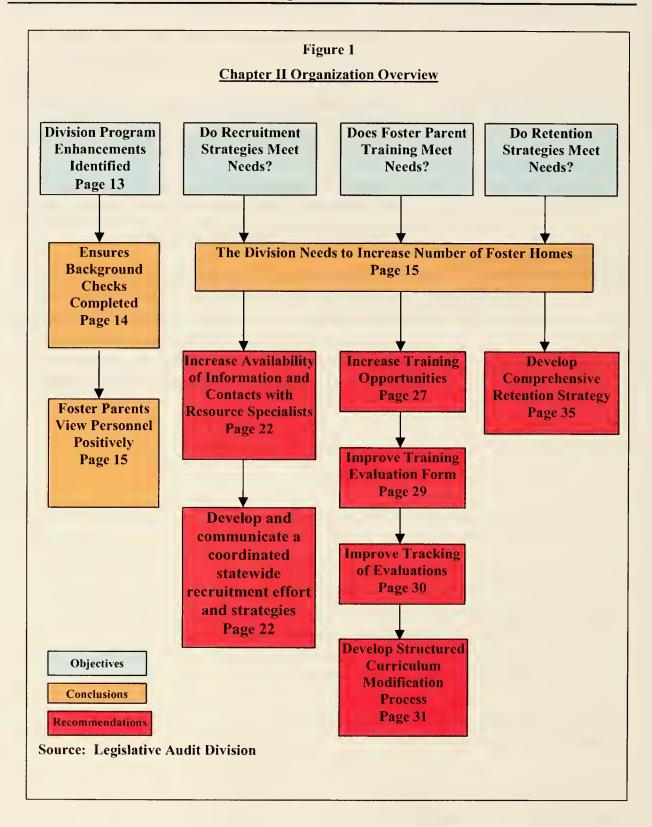
#### Chapter I - Introduction and Background

care and availability of placements by age. Consequently, the division has more difficulty finding adoptive placements for older children.

- Licensed for or accepting sibling groups. Commonly, siblings need foster care, and the division attempts to keep siblings together whenever possible. The division cannot place a sibling group in a home if it violates license conditions.
- Children with special needs. Many children in foster care have special needs resulting from abuse, neglect, or mental or physical health concerns. Some foster parents may not have the ability or desire to care for children with special needs.

#### **Report Organization**

The following chapter provides more specific information about the foster parent program, including division efforts to enhance and improve the program. The chapter also includes recommendations to the department for improving the effectiveness and efficiency of division foster parent recruitment, training, and retention activities. Figure 1 is an outline of audit conclusions and recommendations.



#### Introduction

This chapter presents information about Child and Family Services Division (division) foster parent recruitment, licensing, and activities. The chapter includes information about the strengths of division foster care program activities and areas needing improvement.

#### The Division Has Worked to Enhance the Foster Parent Program

The division has worked to enhance the foster parent program and increase the effectiveness of the recruitment and retention of foster parents. Division accomplishments include:

- ▶ Implemented a compliance unit to verify whether children in care are eligible for federal foster care and adoption assistance reimbursements (IV-E program). The federal IV-E program reimburses the state for almost three-quarters of eligible foster care and adoption costs, including foster care placement costs. Compliance unit activities have helped improve consistency of the division's foster care licensing process.
- ▶ Developed and implemented a foster parent training program specific to Montana. The division has also certified non-department employees, commonly foster or adoptive parents, as trainers. This increases the division's pool of available trainers and brings valuable experiences to training classes.
- ▶ Developed and implemented a formal process with the Montana Foster/Adoptive Parents Association (MSF/APA) to resolve disagreements between the division and foster parents. This process clarifies resolution procedures and is designed to protect the interests of the department and foster parents.
- ▶ Cooperated with foster parent groups and associations to support foster and adoptive families. Cooperative activities have included creating community "closets" to provide clothing, household items, and other essential items for children in care.
- ▶ Contracted with a private agency to develop and implement a statewide campaign to increase awareness of the need for foster and adoptive parents.
- ▶ Contracted with MSF/APA during fiscal years 2003-2004 to promote local foster and adoptive parent associations and

provide training and guidance to these associations. Future contracts with MSF/APA will depend on funding availability.

#### **Background Checks**

The division requires that prospective foster parents submit to background checks, which include checking division records for a history of abuse or neglect and conducting a criminal background check. We reviewed licensing files and interviewed division personnel to verify the division completes background and criminal background checks on foster parents during the licensing process. Audit testing determined the division completes these checks before licensing.

#### Conclusion #1

The division has established processes to assure licensing personnel conduct background checks of foster parents. Additionally, our review indicated licensee files had documentation of background checks.

Foster Parents Generally View Division Personnel Positively Our evaluation of the foster parent program included surveying foster parents about division activities, interviewing foster and adoptive parents, and observing division activities with foster parents. Audit work indicated overall foster parents view the program positively. Examples of positive responses included:

- Over 83 percent of all foster parents responding to our survey indicated department personnel always, or usually, treat them with respect and act professionally.
- ▶ 84 percent of foster parents with regular or specialized licenses said children placed in their home meet their age preferences.
- ▶ 87 percent said the division never or rarely places more children in their home than they want.
- Over 92 percent of all foster parents said the licensing and relicensing processes are straightforward, or somewhat straightforward.
- ▶ 85 percent said FRS personnel provide proper help to complete the licensing process.

▶ 87 percent of all foster parents said the training program presented useful information.

#### Foster Parents Generally Stop Providing Foster Care for Personal Reasons

To examine division retention efforts, we asked former foster parents to identify the three primary reasons they stopped providing foster care. The three most cited reasons for leaving foster care were:

- Adopted a foster child (49.5 percent).
- Lifestyle changed, such as retirement or employment (22.7 percent).
- Family status change, such as a birth, death, or other significant event (21.0 percent).

#### Conclusion #2

Overall, foster parents view division personnel they work with positively, and personal reasons not directly related to division activities are the primary reasons cited for leaving the foster care program.

#### Division Not Meeting its Recruitment Objectives

While the division has made enhancements to the foster parent program and foster parents generally responded positively about the program, the department has not been meeting its objectives for increasing the number of licensed foster homes. In 2001, the division established an objective for a 5 percent annual increase in the number of licensed foster and adoptive homes to assure appropriate matches between children and foster families. However, in fiscal year 2004 the division had 60 fewer regular and specialized foster homes than in fiscal year 2001, an 8 percent decrease. While the division experienced an overall decline in the number of children in regular and specialized foster care homes during this period, that decline was surpassed by the decline in the number of foster homes. Department personnel stated that recently finding foster care placements for children is difficult. Additionally, the federal review of division foster care activities in 2002 reported foster care system stakeholders indicated a lack of placement options adversely impacted foster child placement stability.

In 2003, the division established new objectives that focus on finding the most appropriate foster care placements rather than the number of foster homes. However, increasing the number of foster homes will increase the pool of placement options, subsequently enhancing the division's ability to meet its qualitative objectives. Table 3 provides information on the numbers of licensed foster homes and number of children in foster homes.

Table 3

Number of Foster Homes and Children in Care<sup>1</sup>

Fiscal Year End

Fiscal Years 2001-2004

	2001	2002		2003		2004	
	Number	Number	% Change <sup>2</sup>	Number	% Change <sup>2</sup>	Number	% Change <sup>2</sup>
Family Foster Homes	752	718	(4.5%)	666	(7.2%)	692	3.9%
Children in Family Foster Care	1,568	1,421	(9.4%)	1,441	1.4%	1,491	3.5%

Data includes regular or specialized care foster homes and children in regular or specialized foster care homes. Kinship Placements are not included.

Source: Child and Family Services Division

### Significant Regional Variations

Division records indicate regional fluctuations in the number of licensed regular and specialized foster homes between fiscal years 2001 and 2004. While one region experienced a significant increase in the number of foster homes accompanied by a decrease in the number of children in care during this period, other regions experienced significant decreases in the availability of foster homes. For example, one region experienced a 19.6 percent decrease in the number of foster homes but only a 3 percent decrease in the number of children in care.

<sup>&</sup>lt;sup>2</sup> Percent change from previous fiscal year.

#### Conclusion #3

The Child and Family Services Division has experienced an overall decline in the number of licensed regular and specialized foster families that has exceeded the decline in the number of children placed in family foster homes. The division will need to increase the number of licensed foster homes to help meet its goals and objectives for improving placement matches.

# Recruitment, Training, and Retention are Essential

A limited availability of foster homes can adversely affect a number of division programs and objectives, including:

- Limiting the division's ability to place children in the most appropriate foster homes.
- Increasing the demands placed on existing foster homes, which may adversely affect foster parent retention.
- Potentially reducing stability of children in care by using temporary placements more frequently pending a more permanent or suitable placement.

The division must recruit and train new foster parents, as well as retain licensed foster parents, to maintain an adequate number of foster homes to meet its placement goals and objectives.

Furthermore, the success of each of these areas impacts one or both of the other areas. For example, effective training and retention efforts that lead to positive foster care experiences can encourage foster parents to refer interested persons to the program. Effective recruitment and training programs are essential for retaining foster parents by ensuring they are aware of, and have the tools and skills to meet, the challenges of foster parenting and needs of children placed in their homes.

#### Comprehensive Plans for the Foster Parent Program

The division does not have comprehensive statewide plans for recruiting, training, and retaining foster parents. Historically the division has delegated most recruiting, training, and retention activities to family resource specialist personnel (FRS) located in regional and local offices with minimal direction or guidance from

the division. FRS activities contain the same basic components throughout the state, and typically include:

- Promoting the foster parent program at community events, encouraging foster parents to refer interested persons to FRS personnel, and arranging advertising and public service announcements.
- Scheduling and conducting training for foster parents.
- ▶ Providing support and referral services to foster parents.
- Scheduling and coordinating foster parent appreciation activities, such as annual dinners or picnics for foster parents.

While FRS activities throughout the state are similar, the timing and extent of activities can vary significantly. Furthermore, the division has not coordinated activities to create a more effective and efficient program. While specific activities vary among and within regions, the basic activities are similar throughout the state.

The following sections identify areas for improvement.

Recommendations address improving foster parent recruitment, training, and retention. The sections also present practices and program strategies for improving the foster parent program. Many of the practices and strategies were identified during audit work in regional and local offices, which the division could implement statewide.

# The Division Needs a Comprehensive Recruitment Plan

The division relies primarily upon foster parents and "word of mouth" to recruit new foster parents. Most survey respondents indicated they learned about foster care from family or friends or from division personnel. Kinship foster families are most likely to learn about the program from division personnel after a child is removed from a home, while regular and specialized foster parents are more likely to learn about the program from family or friends. Table 4 summarizes survey responses.

Table 4

How Foster Parents Learned About Foster Care

	Kinship Foster Parents	Regular/Specialize Foster Parents
Friend/Family	28%	51%
State/County	63%	22%
Religious/Civic Group	1%	4%
Information Booth	0%	1%
Advertisement	1%	6%
Other Sources	7%	16%

Source: Compiled by Legislative Audit Division from foster parent responses to survey.

Division personnel also said a foster family is their most effective recruiting tool. While foster family referrals may be useful for recruiting new foster families, the division could expand and enhance its current recruiting efforts.

# Recruitment Requires a Comprehensive Plan

According to a private national operating foundation serving children, youth, and families in the child welfare system, an effective and efficient recruitment effort requires a comprehensive and coordinated plan. The division could improve its planning in a number of areas, including:

- ▶ Increased public access to program information.
- ▶ Improved coordination of recruitment activities.

# Improve Access to Program Information

The division could expand efforts to make program information more available to persons seeking information about foster parenting or wanting to contact the division for additional information. Program information, such as contact information and licensing requirements, is generally limited to agency brochures, in advertisements, at recruiting events, and from FRS personnel.

Obtaining contact or program information from other, more general, sources is limited. For example, four of seven larger city or regional telephone listing did not have local or state telephone numbers for contacting the division about the foster parent program.

Also, the department and division websites are not designed for persons to easily obtain program information, and information available is limited to brief explanations about foster care activities. We reviewed websites for seven other states' child protective services agencies, including Montana's five neighboring states, for information about becoming a foster parent. These websites were easy to find and navigate and provided more detailed contact and licensing information than did Montana's website. Six state websites provided extensive information about foster parenting, including:

- Needs of children in care and types of foster care needed.
- Licensing information, including application forms and training requirements.
- Training requirements, scheduled training dates and locations, and contact information.
- Information about support services for foster parents.
- Reimbursement rates.

Expand and Improve Coordination of Recruitment Efforts

The division could improve coordination of foster parent recruitment efforts. Interviews and division documentation indicate little coordination of recruiting efforts and variations in recruitment activities and efforts. Examples identified include:

Some regional managers and staff were unfamiliar with the specifics of the division's public awareness campaign and contracted recruitment activities, including content and airing of public service announcements on local cable networks. Several regional and local offices had not received brochures and posters designed to supplement the recruitment theme in the public service announcements. One region received only five posters for distribution throughout the region.

- ▶ Some FRS offices primarily focus recruitment efforts in the urban areas and larger communities, and provide minimal or no recruitment activities in rural areas or communities outside the immediate area. Other offices have expanded recruitment efforts to include smaller communities and rural areas.
- One region was planning a recruitment campaign separate from the contracted public awareness campaign, which used a different theme and provided different contact numbers than the statewide campaign.
- ▶ FRS supervisors meetings focused primarily on licensing policies and procedures, and did not include discussion of or planning for recruitment.
- ▶ The division provided minimal or no training or discussion of recruitment activities during annual FRS conferences.

# A Comprehensive Statewide Effort Would Help

A statewide effort to publicize and promote the needs for foster parents is essential to effective recruiting. Statewide recruitment reaches the public through media and public outreach activities, such as TV and radio public service announcements, newspapers, and other public events. Typically, statewide efforts focus on increasing public awareness about the importance of and need for foster parents. A coordinated statewide effort allows FRS personnel to focus more of their efforts on child-specific recruiting (i.e., identifying family members or family friends as foster parents) and targeted recruitment efforts (i.e., specific kinds of children in need of temporary or permanent placements).

Not having a coordinated statewide campaign has affected the efficiency and effectiveness of the division's recruitment efforts. For example, lack of coordination:

Creates Duplication of Effort. Coordinating recruitment efforts statewide would increase efficiency. For example, one regional office received a grant to fund production of a television public service announcement (PSA) available for statewide distribution. The division subsequently contracted for production of another PSA. Additionally, improving communication and coordination among FRS offices would increase opportunities for staff and management to share recruiting ideas and best practices.

- Promotional campaigns are intended to increase public name recognition of a cause or need, and typically use "tag lines," slogans, or themes to facilitate public recognition of the cause, and rely heavily on repetition. Running distinctly different promotional campaigns, as well as separate contact information may limit the effectiveness of the recruitment efforts.
- Restricts the Pool of Potential Foster Families. Limiting recruitment efforts to larger cities or communities limits the pool of potential foster families to those areas. While these areas may have higher demands for foster families, expanding outreach efforts in rural areas will increase the pool of potential foster families. Furthermore, since the division recruitment efforts also include adoptive families, the division would increase pool of potential adoptive families.

**Summary** 

The division has not placed enough emphasis on coordinated statewide recruiting. A comprehensive statewide recruitment effort is more effective for raising for raising the agency's profile and increasing public awareness of the continuing need for foster families, according to a national foundation. Furthermore, having a statewide coordinated approach creates synergy by allowing regional and local offices to build upon statewide recruiting activities.

#### Recommendation #1

We recommend the division develop and implement a statewide plan and strategies for improving division recruitment activities by:

- A. Improving the public's ability to contact FRS personnel and access foster parent program information.
- B. Developing and implementing a coordinated statewide recruitment effort that includes processes to ensure regional and local recruitment efforts are coordinated with statewide efforts.

#### Management Memorandums

During our review of division recruitment activities, we identified two areas for improving division activities that are not addressed in report recommendations, but warrant further department examination.

# FRS Participation in Family Group Conferences

The division uses family group conferences to help identify parental and child needs, develop case plans, and clarify case participants' roles for resolving cases in the best interests of a child. Family group conferences include division personnel and, as appropriate, parents and other family members, foster parents, and children. Conferences include efforts to identify appropriate kinship placements to promote stability for children removed from their homes. As licensing specialists, FRS can provide more specific information to family members about licensing requirements and procedures and help identify potential kinship placements.

FRS participation in family group conferences varies among regions. FRS in some offices are regularly notified of and participate in conferences, while FRS participation in other offices may be more sporadic. Increased emphasis in FRS participation in family group conferences may help case workers identify and recruit kinship foster families. Furthermore, identifying and recruiting kinship homes for child placements may help reduce the demands on, and subsequently increase the availability of, regular foster homes.

# Revising Language in Recruiting Contracts

The division contracted with a private agency to help recruit adoptive and foster parents. Contract language states the contractor will "develop a program in Montana entitled 'One Church One Child." While it is appropriate for the department or contractor to coordinate recruiting activities with faith-based organizations, contract language that mandates establishment of a specific religious program appears to violate constitutional provisions relating to establishment of religion.

# Improving Orientation and Pre-service Training

The division requires prospective foster parents complete the division's orientation and pre-service training, Keeping Children Safe and Families Strong (KCS), before being licensed as a regular

or specialized foster home. We identified two areas for improving the KCS training program:

- Increase availability of training classes for foster parents to maintain their commitment to providing foster care and to license them more quickly.
- Development of standards for availability of KCS training.

# Increasing Availability of Training for New Foster Parents

KCS training classes for prospective foster parents are limited in some offices or regions. Examples identified included:

- ▶ <u>Limited Training Opportunities</u>. Some offices, including offices in the state's largest communities, only offer training two or three times a year, typically in the winter, spring, and fall. In these areas, prospective foster parents wait up to six months to start training.
- Minimum Class Sizes. Some FRS require a minimum number of participants before a class is offered, and may not offer classes unless there are at least 12-15 participants. FRS cancel or delay training until more persons enroll, which may discourage some persons and further delay licensing.
- ▶ <u>Limited Training Locations</u>. Some areas offer training only in the communities where FRS are located, requiring foster parents in outlying communities or rural areas to travel extended distances to attend training.
- Training Schedules Are Not Distributed Regionally or Statewide. The division does not have a process for distributing training dates statewide to division personnel or prospective foster parents. This limits the ability of FRS and new foster parents to identify training alternatives that best meet the needs of foster parents.

Ensuring training is available is essential for maximizing recruitment efforts. According to division personnel and recommended recruiting practices, an agency should offer training to persons soon after their inquiry and application. Additionally, training should be offered in locations that minimize participants' travel time and costs.

# Limited KCS Training Opportunities Can Reduce Access to Federal Funds

Limited training availability can also increase general fund expenditures. Division policy allows FRS to issue "provisional" licenses to prospective foster parents who have not completed all licensing requirements, such as KCS training. While the division uses provisional licenses for several purposes, FRS commonly issue provisional licenses when foster parents are needed to provide care to a specific child or there is a shortage of licensed foster homes in the area. Between January 2000 and June 2004, the division issued provisional licenses to 116 homes. Approximately 57 percent of provisional licenses were issued for kinship placements.

The division reimburses foster parents with provisional licenses at the same rates as regularly licensed foster parents. However, the division cannot use matching federal IV-E funds for IV-E eligible children placed in these homes. Consequently, the division must use either state general fund or other limited funding sources to reimburse provisionally licensed foster families.

Provisional licenses are limited to six months, but may be extended up to an additional six months. According to division information, the division extended provisional licenses for 50 of 116 foster homes beyond six months between January 2000 and June of 2004, and lost approximately \$27,000 of IV-E funding for these placements. During this same period, the division could have received more than \$54,000 of IV-E funding by reducing the time foster families had provisional licenses to 120 days.

The Division Should Set Standards for Training Availability

Since the division has not established standards or expectations for KCS training availability, regional and local offices have developed their own criteria. Examples of local criteria included:

Minimum Class Sizes. Some offices have established minimum class size requirements before offering training, such as 12-15 participants. Some FRS personnel stated the interactive tools in KCS need minimum class sizes to be effective.

- "Seasonal" Training. Some FRS offer training only during the spring or fall to accommodate the agricultural and ranching communities, or do not offer training during the summer because of summer vacations and activities.
- ▶ Training Formats. Some FRS limit training to a preferred format, such as three-hour weekly classes over six weeks.

Although FTE and geography will limit the number and location of training, the division can modify practices and policies to increase training availability. The following list of options describes practices used by regions or local offices to increase training availability.

- Expand Outreach Efforts. Some regions and local offices provide regular training in communities outside regional and local offices. Since training in outlying communities supplements training in the regional or local offices, workload requirements limited outreach efforts to annual or biennial training. However, these classes can help promote the need for foster families in rural areas and can be an effective outreach effort.
- ▶ <u>Use Non-department Trainers.</u> Some regions use nondepartment trainers to provide training to prospective foster families in remote areas or communities. This option was typically limited to special circumstances when KCS training was not otherwise available.
- ▶ Set Minimum Expectations for FRS. One region requires each FRS to present at least three or four training sessions per year. The region has also established a schedule that offers 18 training classes annually.
- ▶ Establish Annual Training Schedules. One region established an annual training schedule for the region, which is given to division offices and private organizations that assist with foster parent activities in the region. In addition to helping division personnel plan activities, persons interested in foster care can identify training dates that best meet their schedules.
- Revise Provisional License Policy. One region set an objective to limit provisional licenses to four months.

- <u>Reimburse Travel Expenses</u>. One region reimburses foster parents for travel expenses to attend training in another community or region. This option is generally limited to instances when timely training is not available in the foster parents' area and it is cost effective for the division.
- Increase Training Format Options. To meet foster parents needs, some offices offer prospective foster parents a variety of training formats, such as attending weekly classes or weekend seminars.
   Seminar sessions can reduce FRS and participant travel in rural areas.
- Offer Frequent Orientation Sessions. One office has offered the three-hour orientation session to prospective foster parents if training is not immediately available.

The division could expand training opportunities through increased coordination within and among regions. While some intra-agency informal communication and coordination exists, division personnel are typically unaware of training offered in other communities or regions. With increased coordination, the division can offer prospective foster families the opportunity to attend training in another community at an earlier date. In some instances, foster families could significantly reduce their travel time and costs by attending training that is closer to their home, but outside the division administrative region in which they live.

#### Recommendation #2

We recommend the division increase KCS training opportunities by:

- A. Establishing minimum standards for the number of classes division staff are expected to teach and for minimum class sizes.
- B. Develop and implement strategies and practices to increase KCS training accessibility in rural areas.

Improving Processes for Evaluating and Modifying the KCS Curriculum

KCS training is a critical step in the licensing process and essential for improving retention of foster families. The division designed the

KCS curriculum to provide foster parents the basic tools necessary to care to children in foster care, many of whom have special needs resulting from abuse and neglect. We identified several areas for improving the division's ability to monitor, evaluate, modify, and improve KCS training.

# The Division Can Improve the KCS Evaluation Form

The division can improve how KCS class participants evaluate training. At the conclusion of KCS training, the division requests that participants rate five general training activities, as well as the most and least useful training sessions. The evaluation form provides the division with some general information about participants' views of overall course content and presentation but does not provide the division with feedback on specific or individual training activities, such as training modules, class exercises, and presentation of materials.

Guidelines for performance management state an effective performance measurement system should be designed to collect information essential for comprehensive evaluation of program activities. The division could enhance its evaluation form and process by requesting participants to:

- Evaluate training content at the conclusion of each training module or presentation.
- Evaluate performance of trainers.
- ▶ Evaluate the training methodologies, such as use of lectures and group exercises.
- Identify additional training needs for the KCS curriculum and annual training.
- Provide information about training accessibility.
- ▶ Identify how they learned about the division's foster care and adoption programs.

The division could expand its evaluation process by requesting participants complete follow-up evaluations several months later to

evaluate training effectiveness in practical application, as well as identify additional training needs.

#### Modifying the KCS Evaluation Form

The division could enhance the KCS participant evaluation tool with existing resources. The division has established a committee to examine KCS training and submit recommendations for improving the training curriculum. The committee could modify the evaluation form to obtain information that ties directly to performance measures and serves as a basis for future evaluations and planning.

#### Summary

The division's KCS participant evaluation form has limited effectiveness as a curriculum evaluation and development tool because it requests participants provide only general responses or observations about the training.

#### Recommendation #3

We recommend the division modify its training evaluation form to obtain information necessary to comprehensively evaluate training operations and the effectiveness of the program relative to training goals and objectives.

The Division Can Improve Tracking and Monitoring of KCS Evaluations

The division also does not have an effective system for tracking and monitoring participant evaluations of KCS training. Trainers review evaluations, and then forward the evaluations to either their supervisors or directly to the Training Unit at the division's central office. Training unit personnel review the evaluations, but do not enter evaluation responses into a system that allows for regular monitoring of, or timely access to, the data by division program personnel. The division has compiled statewide evaluation data once, in 2002.

Performance management guidelines also state an effective evaluation system should provide readily available periodic results information. Since division staff must manually compile data, the division cannot readily access the information. Since the division

for modifying KCS training without input from persons receiving training.

#### **Summary**

Audit work suggests limited use of evaluation information is due in part to the resources required to compile the data. Developing a system for storing and retrieving participant evaluations will increase the division's ability to monitor and evaluate the effectiveness of its training program. The division could also increase efficiencies by implementing a "desk-top" automated management information system for tracking evaluations using an available database system. The division may require technical support from the department to develop and implement an automated management information system.

#### Recommendation #4

We recommend the division work with the department to develop and implement a management information system that provides timely economical access to evaluation data.

### A Structured Approach to KCS Curriculum Development

The division needs to develop a structured process for continued KCS curriculum development. The training manual includes specific training formats, tools, and information for trainers and participants. However, individual FRS or training teams have modified the division's approved curriculum without approval from central office. Modifications identified included using training materials from previous training curricula, deleting or modifying curriculum sections, and condensing the training into fewer hours. Unapproved modifications and inconsistencies to training can:

- ▶ Reduce the effectiveness of participant training evaluations since they are evaluating potentially different course materials and presentations.
- Infringe upon copyrights if using materials without approval from the copyright holder.
- ▶ Provide less assurance participants receive training the division has determined essential for foster or adoptive families.

It is a well-established practice for training programs to establish procedures for developing and modifying a training curriculum. Additionally, federal regulations require licensing standards be applied to all licensed foster homes, which indicates changes to the curriculum be part of a structured evaluation and approval process. Without established procedures, the division increases the risk training modifications will not meet the division's strategic and operational standards, goals, and objectives.

The Division Should Establish a Structured Curriculum Development Process

A structured process for reviewing and modifying KCS training would help maintain the integrity of the KCS training program and increase assurance the training meets state and federal licensing standards. The division has established a committee to evaluate and modify the KCS curriculum, and could assign the committee responsibility for establishing training standards and drafting policies and procedures addressing modifications to KCS training curricula.

#### Recommendation #5

We recommend the division establish a structured process for reviewing and modifying the approved training curriculum to assure compliance with state and federal training standards.

#### Foster Family Retention

Retaining foster families is another critical step in maintaining foster home availability. Of 280 survey respondents who indicated they were currently licensed for foster care, 149 (53%) indicated they were considering discontinuing their foster care services. However, the division does not have a plan for evaluating and improving division retention efforts. Department support for and communication with foster parents is critical for foster parent retention. Consequently, retention efforts involve other division personnel, such as:

Social workers. Social workers have primary responsibility for case management, including placement decisions, services provided to foster parents and children in care, and ongoing case activities.

- Social work supervisors. Supervisors are responsible for oversight of case activities, and are a key step for resolving misunderstandings and differences between social workers and foster parents.
- Regional administrators and division managers. These senior level division managers are a subsequent step for resolving foster parent and social worker problems. They are also responsible for setting policies and priorities within the division and among regions.

While recruitment and training activities primarily rely on FRS personnel, a strong retention effort requires division-wide efforts that support foster parents. The following sections identify areas for improving foster family retention.

#### The Division Can Improve Communication with Foster Parents

To evaluate foster parent perceptions of the division's foster parent program and satisfaction with division activities, we surveyed foster parents who were licensed between January 2000 and December 2003.

Foster parent responses suggested social workers generally comply with foster parent contact policies. Approximately 72 percent of respondents said they had at least monthly contact with social workers, and 91 percent said they had at least quarterly contact with social workers. However, approximately 24 percent responded there was not enough contact.

Overall, the majority of foster parents responded positively about division communication and coordination efforts. Foster parent responses also indicated areas for improving division communication and coordination with foster families. For example:

- ▶ 33 percent responded that social workers never, rarely, or sometimes inform them about the case status of a child.
- ▶ Of foster parents responding that levels of contact were sufficient, 20 percent stated they were not kept informed of case status.

- ▶ 28 percent said social workers never, rarely, or sometimes provide essential information about foster children to provide care or protect their family.
- ▶ 27 percent responded that social workers never, rarely, or sometimes respond to calls for assistance in a timely manner.
- ▶ 17 percent responded they were not informed during KCS training of clothing allowances, and 26 percent responded they were not informed of the availability of other supplemental reimbursements for costs such as unusual transportation costs to medical providers.
- ▶ 49 percent responded they were not aware the division had a formal dispute resolution process for addressing foster parent complaints.

Analysis of survey responses also indicated areas for improvement can vary significantly by region and type of foster care provided. For example:

- ▶ Kinship foster parents generally responded more positively about division communication than foster parents with regular or specialized licenses, and foster parents with specialized licenses were the least positive about division communication efforts.
- ▶ Significant differences in satisfaction with division communication existed among regions. In some instances, variations in responses by region varied as much as 20 percent.

The Division Can Improve Evaluation of Retention Efforts

The division can improve evaluation of its retention efforts and foster family satisfaction with program activities. The division has relied primarily on field and supervisory personnel to evaluate retention efforts. Monitoring and evaluating a program regularly is essential for planning future program activities and maintaining an effective program. Establishing a regular monitoring and evaluation system could help the division identify statewide, regional, and local strengths and areas for improvement. One region had surveyed foster parents to obtain their input on the region's foster care activities. The region also began requesting foster parents who are discontinuing foster care complete an exit survey form to help regional management identify strengths, needs, and areas for

improvement. The region also designed its surveys to evaluate program efforts by administrative districts within the region.

# Improving the Division's Retention Efforts

From interviews with division personnel and reviews of other states' activities, we compiled some common management and staff practices the division could use to enhance its retention efforts.

- Conduct Town Meetings. Some regional management personnel conduct "town meetings" and "brown bag lunches" in communities to discuss program activities with foster parents or attend foster and adoptive parent support group meetings.
- Expand Methods of Communication. Interviews indicated division personnel tend to rely on telephone communication for communicating with foster parents. Increasing use of e-mail has improved communication with foster parents and allows more efficient use of staff time. Some FRS provide foster families with their direct office and cellular telephone numbers.
- ▶ <u>Send "Thank You" Notes.</u> Division personnel sent "thank you" notes or cards to foster parents.
- Provide Information Sheets. Some offices give foster parents information sheets that contain basic information such as reimbursement or contact information.
- Increase Social Worker Involvement in Appreciation Events. In some areas, social workers are more actively involved with or assist FRS personnel with foster parent appreciation events, planning recruiting and retention activities, and training activities.
- Clarify Division and Foster Parent Responsibilities. Some states sign agreements with foster parents that clarify responsibilities, such as information provided to foster parents and whether foster parents or caseworkers are responsible for transporting children for parental visits.
- Develop a Foster Parent Information Website. Some states maintain websites that include information about providing examples of agency forms, and links to other foster parent resources.

Publish Newsletters. Some offices inform foster parents about program activities, either through office or foster parent organization newsletters.

#### **Summary**

The division has not developed and implemented a comprehensive plan for increasing foster parent retention. The current approach does not include strategies and objectives for improving division communication with foster parents and strategies for evaluating and monitoring division retention efforts.

#### Recommendation #6

We recommend the division develop and implement a comprehensive plan with specific strategies for improving foster family retention activities.

#### Management Memorandum

During our review of division training activities, further areas for improvement were identified that are not addressed in report recommendations, but which warrant management consideration:

- Expand Continuing Education Opportunities. The division requires licensed foster parents receive a minimum of 15 training hours for re-licensure. FRS staff are generally responsible for finding and scheduling formal training opportunities, such as presentations by child care and treatment specialists. Typically, these training opportunities are limited to one community, although some offices have recorded presentations for use in other areas. The division should explore methods for increasing opportunities to make formal training opportunities more available through videotaping and teleconferencing. Increased statewide coordination of formal training opportunities would also increase efficiency of training development.
- Ongoing Training Requirements. Foster parents can meet ongoing training requirement hours annually from a wide variety of options from reading books to watching training videos to attending annual training sponsored by the division or MSF/APA. Generally, FRS accept hours for any training that relates to providing foster care. However, foster parents self-report training hours, and the division has minimal controls for verifying all foster parents complete required annual training. To increase assurance foster parents receive annual training, the

- division could modify its policies to require foster parents receive some formal training such as attendance at classes or completion of workbooks with accompanying videotapes.
- Increase Library Accessibility. While the division maintains a training resource library for foster and adoptive parents, it is not clear who foster parents should contact to obtain training materials. Options for increasing foster parent access to training materials includes:
  - ✓ Coordinating with libraries to have materials available for lending or reading at a library. Some libraries have mobile libraries which can increase resource availability in rural communities.
  - ✓ Publishing training information on a division website.

    Potentially the division could develop a website that allows foster parents to request training materials directly from the central office.

# Appendix A – Methodology

# Audit Scope and Exclusions

The Legislative Audit Committee requested a performance audit of the Child and Family Services Division's (division) foster parent program. The committee requested the audit based on issues for further study presented in previous audit reports and questions raised by other legislative committees. Areas requested for examination included:

- Division efforts and activities for recruiting new foster parents.
- Division training for new foster parents.
- Division efforts to retain foster parents.

The audit period was limited to fiscal years 2000-2003.

#### **Scope Exclusions**

The division's foster care activities include many other activities which were excluded from scope during audit planning, including:

- Division decisions related to level of care or placements in foster homes.
- Social work activities, including services for children and family reunification.
- Approval of un-licensed kinship homes for children in foster care.
- ▶ Foster parent licensing activities.
- Licensing and monitoring of child placement agencies, therapeutic residential and outpatient service activities, and foster care services for which the division contracts.

#### **Audit Methodology**

We developed the following methodologies to meet the objectives presented in Chapter I.

#### Audit Planning

To gain an understanding of division recruitment, training, and retention activities, we:

- ▶ Interviewed division managers and staff.
- Reviewed foster parent licensing files.
- ▶ Observed a new foster parent training session.
- ▶ Reviewed documentation of foster care program activities.

### Appendix A – Methodology

- Reviewed statutes, rules, and policies related to the foster parent program.
- Interviewed representatives non-profit organizations involved with foster parent program activities.

# Determination of Audit Activities

During audit planning, we determined the following audit work was needed to meet our objectives:

- Review of specific recruitment, training, and retention activities in regional and local offices. We selected two of the division's five administrative regions for primary review. To help ensure we obtained a statewide perspective of division activities, we selected a region that includes several of Montana's larger communities and populated areas and a region that is primarily rural with a number of smaller communities. Audit work in the two regions included interviewing division personnel and reviewing documentation of program activities. We also conducted limited interviews and documentation review in the three other regions.
- Survey foster parents about their foster care experiences with the division.
- ▶ Review of foster parent licensing files. We reviewed a statistical sample of foster parent licensing files to obtain demographic information about foster parents and verify division compliance with program requirements.
- Review of other states and agencies foster parent program activities.
- ▶ Review of Child and Adult Protective Services (CAPS) data. CAPS is an automated management information and payment system for the Department of Public Health and Human Services (DPHHS). We examined CAPS data related to foster parent licensing information.

#### **Foster Parent Survey**

We surveyed foster parents who were licensed at some time between January 2000 and December 2003. We selected this time period to ensure responses from persons who no longer provide foster care for the division. DPHHS personnel provided us with a listing of foster homes licensed during the time period. The survey population was 2,512 and 738 foster families returned surveys for a response rate of 29.4 percent. Survey response studies and LAD prior survey

response rates indicate this is an acceptable response rate. The survey and foster parent responses are reported in Appendix B.

#### **Foster Parent Recruitment**

To examine division recruitment efforts, we interviewed division managers and staff in two regions about recruitment activities and obtained documentation of recruitment activities. We also interviewed personnel in other regions as available to verify or contrast with information obtained from other areas.

# Training for New Foster Parents

We reviewed the division's training manual for new foster parents, and observed a training session. We interviewed division personnel and reviewed documentation about training activities, including training availability, training content and materials, and curriculum evaluation. We also reviewed evaluations of training submitted by participants.

#### **Foster Parent Retention**

To examine foster parent retention efforts, we analyzed division program information, including historical information about the number of foster homes. In addition to analyzing survey responses, we interviewed new foster parents about their expectations from the division and observed a local meeting of division representatives and foster parents and reviewed documentation of a similar meeting in another community.

#### Review of Other States Foster Parent Program Activities

We reviewed documentation from other states about their foster parent program activities. Other states included in our review were:

- North Dakota
- ▶ South Dakota
- Wyoming
- ▶ Idaho
- Minnesota
- Texas

We also reviewed documentation from private organizations involved in foster parenting activities.

# Appendix B - Survey Response Data

To obtain foster parent perceptions of the division's foster care program, we requested foster parents to complete a questionnaire. Our population included persons licensed as regular, specialized, or kinship foster care providers between January 1, 2000 and December 31, 2003. We sent questionnaires to 2,512 licensed foster parents, and received 738 responses. The following table presents the questionnaire and aggregate responses.

esponses by R	Region (Regional Of	fice Loca	tion)							
Eastern Reg	gion I (Miles City)		1	3%	Sout	hwest	Region IV (	Helen	a)	20%
North Cent	ral Region II (Great )	Falls)	1	6%	Wes	tern Re	egion V (Mi	ssoula	)	26%
South Cent	ral Region III (Billin	igs)	2	25%						
Foster Pare	nts in Home				One Pa	rent	Two Pare	ents		
ruster rare	mts in Home			[	20%	, o	80%			
Single Perer	nt Foster Homes He	adad Dv	A •	Т	Mal	e	Femal	e		
Single I al el		aueu by	A.		9%		91%			
T			Re	gular	r		Kinship		Sp	ecialized
Type of fost	er care provided:		5	4%			28%			18%
			One		Two		Three	1	Four	Five or S
Licensed for	how many children	n:	32%		33%		17%		9%	9%
Learned about	Friend/Family	State/C	County		ligious or ic Group		formation Booth		Ad	Other
foster care from:	44%	33'	%		3%		1%		5%	14%
Became fost	er parent to	Foster c	are only	y	Kinship (	Only	Adoj	otion		Other
provide:		439	%		26%		28	%		3%
	consider adopting a	foster ch	ild Y	Zes o	r Did Ad	opt	No			Maybe
that was pla	ced with you?				61%		18%			21%

Foster care orientation and pre-service training:	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don't Know
Presented useful information for providing foster care services.	36%	50%	6%	4%	2%	2%
Was provided within a reasonable time (2 months from my request).	35%	47%	8%	6%	2%	2%
Was located within a reasonable distance from my home.	39%	49%	5%	4%	1%	2%
Considered my scheduling needs.	25%	42%	23%	6%	2%	2%
Provided information about the daily rate paid for providing foster care.	26%	46%	10%	10%	3%	5%
Provided information about a clothing allowance for children in my care.	22%	44%	11%	12%	6%	5%
Provided information about reimbursements for other costs, such as transportation to medical providers.	18%	38%	13%	18%	8%	5%
Informed me about availability of respite care.	20%	42%	11%	13%	8%	6%
CFSD should increase the number of hours for orientation and pre-service training.	9%	14%	41%	25%	6%	5%

On-going training provided by the division:	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	Don't Know
Relates to providing foster care services.	18%	53%	17%	3%	2%	7%
Has improved my ability to provide foster care.	18%	43%	25%	6%	2%	6%
Is usually scheduled at a reasonable time.	15%	50%	21%	6%	2%	6%
ls usually scheduled at a convenient location.	16%	49%	20%	6%	3%	6%
Ongoing training requirements are sufficient.	14%	49%	21%	6%	3%	7%
Most frequently used methods to meet ongoing	g training re	quireme	nts			
Attending Division-Sponsored Training	18%		ding Foster/Ad Meetings/Tra	•	ıt Support	22%
Using a Division Resource Library	18%	Other				18%
Attending training sponsored by the Montana State Foster and Adoptive Parent Association (MSF/APA)	24%					

# Appendix B - Survey Response Data

Foster Care Licensing			Yes	Somewhat	No
The <u>licensing</u> process was straightforward and not un	nnecessarily l	ourdensome.	70%	25%	5%
The re-licensing process is straightforward and not u	nnecessarily	burdensome.	71%	21%	8%
The licensing specialist provided proper help to com	plete the lice	nsing process.	84%	11%	5%
How many months did it take to receive your foster	1-2	3	4	5	6+
care license after submitting your completed application?	64%	17%	6%	4%	9%

Foster Child Placements (Not Including Kinship Placements)	Always	Usually	Sometimes	Rarely	Never	Don't Know
Foster children placed in my/our home meet my/our age preferences.	50%	34%	9%	1%	1%	5%
Foster children placed in my/our home meet my/our behavioral expectations.	27%	42%	21%	4%	2%	4%
Foster children placed in my/our home meet our level of care expectations.	33%	45%	14%	3%	1%	4%
Division personnel have placed more children in my/our home than I/we want to provide care to.	1%	2%	6%	15%	72%	4%
I/we have accepted foster care children although we would have preferred to not accept a placement.	1%	2%	13%	11%	67%	6%

Communication and Coordination -	- Contact with 1	Division S	Staff				
I/we have contact with a foster care	licensing	Oı	1e	1	wo	Three	Four or More
specialist how many times a year:		33	33%		24%		34%
The foster care licensing specialist contacts me/us		One		Two Th		Three	Four or More
how many times a year.		37	%	25%		11%	27%
Contact with the feator and linearin	istict in	Not E	nough		About R	ight	Too Much
Contact with the foster care licensing	g specialist is:	15	%		83%		2%
I/we have contact with my/our	Weekly	Twic	e A Mon	th	Mon	hly	Quarterly
foster child(ren)'s social worker:	30%		23%		28%		19%
My/our foster child(ren)'s social	Twice a Month	1 N	Ionthly		Quart	erly	Twice a Year
worker contacts me/us:	37%		35%		199	⁄o	9%
Contact with the child(ren)'s social	Not Enou	gh			About Right 75%		Too Much
worker is:	24%						1%

# Appendix B - Survey Response Data

Relationships with Division Personnel	Always	Usually	Sometimes	Rarely	Never	No Opinion
Social workers keep me informed of my foster child(ren)'s case status.	32%	30%	17%	11%	5%	5%
Social workers respond to my calls for assistance in a timely manner.	40%	30%	16%	7%	4%	3%
Social workers treat me/us with respect.	60%	25%	8%	3%	2%	2%
Supervisors and Regional Administrators treat me/us with respect.	56%	23%	6%	3%	2%	10%
Social workers treat me/us as a valuable part of a child's service team.	55%	24%	10%	4%	4%	3%
Division supervisors and Regional Administrators treat me/us as a valuable part of a child's service team.	47%	25%	7%	4%	2%	15%
Social workers act professionally.	53%	30%	11%	2%	1%	3%
Foster care licensing specialists act professionally/	65%	24%	6%	1%	1%	3%
Social workers provide necessary information about foster children to provide care and/or protect my family.	38%	31%	16%	9%	3%	3%
Social workers provide reasonable help when I request their assistance.	44%	33%	13%	4%	3%	3%

If I have a disagreement or conflict with a social worker regarding a case:	Always	Usually	Sometimes	Rarely	Never	No Opinion
The social worker helps resolve the issue reasonably.	29%	28%	14%	6%	4%	19%
The social work supervisor helps resolve the issue reasonably.	29%	24%	12%	5%	4%	26%
Division management helps to resolve the issue reasonably.	26%	20%	9%	4%	6%	35%
I/we are aware of the CFSD grievance/resolution disagreements between the division and myself.	process	to address		Yes 51%		<b>No</b> 49%

Currently Licensed Foster Parents Plan to	Less Tha	n a Year	1-2 Years	2-4 Years	4 + Years	Until Ado
Continue Providing Care for:	12%	ó	19%			
Reasons Foster Parents are Considering No	Longer P	roviding	Foster Care	(select up to	three reason	s)
Adopting a foster child	15%	Financ	ial costs of pi	oviding fost	er care	11%
Adopting a child other than a foster child	2%	Advers	e impact on i	my/our famil	у	9%
Providing foster care is different than expected	2%	Insuffic	cient support	services		6%
Planning a change in lifestyle that will not allow us to provide foster care	10%	Freque	nt changes in	social work	ers	2%
Need a break from providing foster care	12%	Payme	nt problems			2%
To provide foster care for another agency	1%	No chi	ldren placed	in our home		6%
Poor relationship with social worker(s)	8%	Lack o	f training			1%
Poor relationship with family resource specialist(s)	2%	Other				11%

6% 3% 3% 10% 5% 3%
3% 10% 5%
10%
5%
-
3%
1%
3%
1%
1 the
14%
5%
5%
11%



# **Agency Response**

### DEPARTMENT OF PUBLIC HEALTH AND HUMAN SERVICES



JUDY MARTZ GOVERNOR

GAIL GRAY, Ed.D. DIRECTOR

# STATE OF MONTANA

RECEIVED

DEC 0 6 2004

LEGISLATIVE AUDIT DIV

December 06, 2004

Mr. Scott Seacat Legislative Auditor State Capitol Room 106 P. O. Box 201705 Helena, Mt 59620-1705

Dear Mr. Seacat:

The Department of Public Health and Humans Services, Child and Family Services Division, received and reviewed the Foster Care Program Performance Audit completed by the Legislative Audit Division. We find the audit to provide a balanced representation of issues concerning the foster care program and a focal point for specific improvements.

The division notes two critical issues relative to the recommendations of the audit. The first issue, foster parent recruitment and retention, is a nationwide dilemma. The key to retention is fostering positive relationships between agency staff and resource families, which takes time and superb communication. The workload of CPS staff has been a long-standing concern of the division. Until it is known what can be expected, in terms of time and work product for CPS social workers, it its very difficult to establish minimum standard expectations in terms of developing relationships. The division is initiating a workload study as result of the Performance Audit on Caseload Management in the Department, which is expected to provide valuable information.

The second issue is Montana's geography and the very purposeful decentralization of services for foster care and child protection in to regions in 1987. The aftermath of decentralization continues to provide challenges in creating a uniform and consistent statewide foster care program. Despite these two barriers, the Division is committed to improving the foster care program based on the recommendations of the audit.

#### **Recommendation #1:**

We recommend the division develop and implement a statewide plan and strategies for improving division recruitment activities by:

- A. Improving the public's ability to contact FRS personnel and access foster parent program information.
- B. Developing and implementing a coordinated statewide recruitment effort that includes processes to ensure regional and local efforts are coordinated with statewide efforts.

#### Concur.

- A. The Division will improve the quantity and quality of foster care information available on the Website, including contact information for FRS personnel, by April 1, 2005.
- B. A team comprised of the Family Resource Specialist Supervisors and the Foster Care Program Officer, with input from five regional Permanency Planning Specialists have been working since August 2004, to develop a recruitment theme. A contest was held to solicit potential themes. The Division Administrator donated a prize for the contest winner. The winning theme has been selected. Recruitment materials, including a developed PSA, will be available for statewide in local recruitment efforts. The theme will be widely used during National Foster Parent month in May 2005.

#### Recommendation #2:

We recommend the division increase KCS training opportunities by:

- A. Establishing minimum standards for the number of classes division staff are expected to teach and for minimum class sizes.
- B. Develop and implement strategies and practices to increase KCS training accessibility in rural areas.

#### Concur.

A. While it could be viewed as a simple management edict to require FRS staff to conduct a specific number of KCS training, the division believes an analysis needs to go into the decision. Barriers such as geography, population, economic base, and workload considerations must be made prior to establishing minimum standards. The division is currently developing a workload analysis process for field staff. The anticipated target date for completion is December 2005. Once the workload can be determined, minimum standards for frequency can be established. The division is already making strides to determine minimum class size. The development of the video described below, for use by individuals and couples, may also work in very small groups. Other technologies, such as web casts or MetNet, will also be explored as possible training vehicles.

B. A team of FRS, FRS supervisors and program bureau staff have been working to determine the best training method for rural areas. The plan is to videotape a group session to be viewed by individual couples in rural areas with intermittent contact with a FRS to discuss the video. The videotape will be produced by September 1, 2005, and available after that date. As stated above Web cast MetNet will also be explored.

#### Recommendation #3

We recommend the division modify its training evaluation form to obtain information necessary to comprehensively evaluate training operations and the effectiveness of the program relative to training goals and objectives.

Concur.

The Keeping Children Safe evaluation form is currently being updated and will be completed by January 1, 2005.

#### Recommendation #4

We recommend the division develop and implement a management information system that provides timely economical access to evaluation data.

Concur.

The Division agrees that timely and economical access to evaluation data would be an asset to program improvement and will work with Operations and Technology Division to evaluate and develop a database.

#### Recommendation #5

We recommend the division establish a structured process for reviewing and modifying the approved training curriculum to assure compliance with state and federal training standards.

Concur.

A workgroup comprised of FRS, FRS supervisors and program bureau have been meeting to restructure and update training materials for "Keeping Children Safe", since June of 2004. The purpose of the restructure and update was to assure that resource families would be given comparable information across the state when attending training. The projected date for training all KCS trainers is May 2005. The training will emphasize the necessity of providing resource families the same information. The training will also include the process for making changes to the curriculum.

#### Recommendation #6

We recommend the division develop and implement a comprehensive plan with specific strategies for improving foster family retention activities.

Concur.

The division will develop and implement a comprehensive plan with specific strategies for improving foster family retention activities. The plan will be based on information gathered through a survey completed by the foster parents during their annual relicensing process, the workload analysis that has a December 2005 target date, and input from the FRS supervisors who teleconference monthly and meet quarterly. The target date for the plan is March 2006.

We appreciate the effort that has gone into your examination of the Child and Family Services Division and appreciate the thoughtfulness and professionalism displayed by your staff throughout the audit process.

Please contact me if you have questions.

Sincerely,

Gail Gray, Ed. D

Director

Cc Shirley K. Brown

Marie Matthews Carol Bondy



